

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PETER AND KATHERINE VON BANK,

Plaintiffs,

v.

JEFFREY and RENAE SERSLAND; DAVID
GILL; MEDICAL UNIVERSITY OF THE
AMERICAS; BELIZE, LP; MED QUEST
TECHNOLOGIES, LP, TRUSTEE;
SERSLAND SETTLEMENT TRUST;
MEDICAL UNIVERSITY OF THE
AMERICAS BELIZE, LLC f/k/a MEDQUEST
TECHNOLOGIES, LLC and NORMAN
HANS RECHSTEINER, MD,

Defendants.

Civil Action No. 07-40205-FDS

REQUEST FOR LEAVE TO WITHDRAW AS COUNSEL TO DEFENDANT
JEFFREY SERSLAND

Pursuant to Local Rule 83.5.2(a), C. Alex Hahn, Esq. seeks the Court's leave to withdraw as counsel for Jeffrey Sersland, MD ("Dr. Sersland") in the above matter.

As grounds therefore, counsel states that there is no longer a relationship of confidence and trust between counsel and client, such that it is not possible for counsel to provide legal advice to client nor to make the necessary inquiries prior to the filing of pleadings required by Rule 11. Without limitation, counsel and client have been unable to meaningfully confer concerning the certification which is required by the Court pursuant to Local Rule 16.1, and no such statement has been filed, notwithstanding the fact that a scheduling conference will take place on February 1, 2008. Counsel has, on numerous occasions over a multi-week period, sought to confer with client concerning

the matters covered by Local Rule 16.1 and has provided notice that withdrawal would be sought if such conferral did not occur, which it has not.

Respectfully submitted,

Counsel for JEFFREY SERSLAND, MD

/s/ C. Alex Hahn

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Dated: January 29, 2008